

### **REMARKS**

This is in response to the Office Action dated November 20, 2006. In the subject Office Action, the Examiner objected to Claims 16-20 as lacking proper antecedent basis, and rejected all of pending Claims 1-20 under 35 U.S.C. § 102(e) as being anticipated by U.S. Pat. Pub. No. 2004/0201745 by Wess et al. (hereinafter "WESS"). Applicant hereby amends Claims 16-20 to recite a digital camera system for proper antecedent basis, and amends Claims 1, 8, and 14 for further clarification of the present invention. It is noted that Claim 14 has been amended to clarify that the "camera body" refers to that which was previously introduced. New Claims 21-27 have been added. For the following reasons, it is submitted that all of pending Claims 1-27 are allowable. Reconsideration and withdrawal of the rejections of Claims 1-20 is respectfully requested as well as allowance of new Claims 21-27.

#### ***1. Claims 1-7 are not anticipated by WESS***

The Examiner rejected Claim 1 asserting that the WESS discloses a digital imaging system as generally recited therein. Specifically, the Examiner asserted that WESS includes a housing with a lens for receiving optical radiation, an interface connector, and a digital interface card having an image sensor positioned such that optical radiation from the lens is received when the card is engaged to the interface connector. Furthermore, the Examiner asserted that a microprocessor for processing image data from the image sensor affixed within the housing in electrical communication with the connector is inherent in WESS.

Applicant respectfully submits WESS does not teach all of the features recited in Claim 1 as currently amended, and therefore is not anticipated thereby. In particular, it is submitted that WESS does not teach or suggest a microprocessor that is affixed within a housing and being **"offboard said digital interface card..."** where such microprocessor receives and processes image data from the image sensor.

WESS discloses a memory card including a memory controller that similarly receives and processes image data from the on-board image sensor, where such image data is stored on the flash memory. However, all of the pertinent components of WESS, including the image sensor and the memory controller, are located on the memory card in a self-contained unit. WESS pertains primarily to a convertible film/digital camera: "The invention includes... a camera 16 that accepts both traditional film in the conventional manner and the memory card..." (Paragraph [0029]). Therefore, it would appear to be necessary for the memory controller to be affixed to the

memory card, as all image capture and storage functionality must be independent of the camera. Otherwise, a key advantage of WESS of an interchangeable, self-contained image capture, process, and storage module would not be achieved. Furthermore, maximum processing speed would appear to be attained where the memory controller is onboard along with the image sensor and memory because no additional conversion or interfaces back to the camera would be necessary. Though alternative embodiments of WESS contemplate the use of the integrated memory cards in existing digital cameras (Paragraph [0043]), the pertinent limitations of the memory cards, i.e., the on-board memory controller, are the same. WESS simply does not appear to contemplate the memory controller being offboard the memory card because all image processing and storing is being performed on the memory card.

Accordingly, it is respectfully submitted that Claim 1 is not anticipated by WESS. To the extent that Claim 1 is in condition for allowance, it is respectfully submitted that claims 2-7 are also in condition for allowance, as such claims depend from Claim 1 and recite additional features that further define the invention. Reconsideration and withdrawal of the rejections of Claims 1-7 is respectfully requested.

***2. Claims 8-13 are not anticipated by WESS***

The Examiner rejected Claim 8, asserting that WESS discloses all of the features recited therein. More particularly, the Examiner asserted that a microprocessor affixed within the housing is inherent. Applicant respectfully submits that Claim 8 as currently amended is not anticipated by WESS because not all claimed features are disclosed thereby. As asserted above in relation to Claim 1, it is submitted that WESS does not teach the claimed feature of “a microprocessor... offboard said digital interface card...” The memory controller of WESS is affixed directly to the memory card for speed and modularization purposes. As such, it is respectfully submitted that Claim 8 is in condition for allowance. Reconsideration and withdrawal of the rejection of Claim 8 is respectfully requested. Further, Claims 9-13, which are dependent from Claim 8, are also not anticipated by WESS because additional features that further define the invention are recited.

***3. Claims 14-20 are not anticipated by WESS***

The Examiner rejected Claim 14 asserting that WESS teaches all of the claimed features, including a camera body, an interface connector, a digital interface card, and a microprocessor. With respect to the microprocessor, the Examiner again asserted that it is inherent in WESS.

Application No.: 10/616,612  
Response to Office Action of November 20, 2006  
Attorney Docket: APSCI-001A

Currently amended Claim 14 recites a microprocessor affixed within the camera body and **"being offboard the digital interface card..."** As argued above in relation to Claims 1 and 8, it is respectfully submitted that WESS does not teach this feature, and is accordingly not anticipated thereby. Furthermore, it is submitted that because Claim 14 is in condition for allowance, dependent Claims 15-20 are also in condition for allowance. Reconsideration and withdrawal of the rejections of Claims 14-20 is respectfully requested.

***4. Claims 21-27 are in Condition for Allowance***

For the reasons stated above with respect to claims 1-20, Applicant respectfully submits that Claims 21-27 are in condition for allowance over the art of record.

**CONCLUSION**

On the basis of the foregoing, Applicant respectfully submits that each and every pending claim of the present invention meets the requirements for patentability and respectfully requests that the Examiner indicate the allowance of Claims 1-27 of the present application. An early Notice of Allowance is therefore respectfully requested. If any additional fee is required, please charge Deposit Account Number 19-4330.

Respectfully submitted,

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By:



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